

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA §  
§ No. 6:22-CR-3  
v. § JUDGE JDK/JDL  
§  
LAURA SPAIN HOWARD (06) §

**ELEMENTS OF THE OFFENSE**

COMES NOW, the United States of America, by and through the United States Attorney for the Eastern District of Texas, and files this pleading summarizing the elements of the offense to which the defendant intends to enter a plea of guilty to Count One of the indictment:

Title 18, United States Code, Section 371, makes it a crime for anyone to conspire with someone else to commit an offense against the laws of the United States.

To establish that the defendant is guilty of conspiracy, the government must prove the following beyond a reasonable doubt:

*First:* That the defendant and at least one other person made an agreement to commit the crime of illegal remunerations, as charged in the indictment;

*Second:* That the defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and

*Third:* That one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the indictment, in order to accomplish some object or purpose of the conspiracy.

Respectfully submitted,

BRIT FEATHERSTON  
UNITED STATES ATTORNEY

*/s/ Nathaniel C. Kummerfeld*  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Elements of the Offense was served on counsel of record for defendant via the court's CM/ECF system on this the 17th day of May, 2022.

*/s/ Nathaniel C. Kummerfeld*  
Nathaniel C. Kummerfeld